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August 25, 2000

Manager, Dissemination Branch
Information Management and Services Division
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Washington, DC 15301

2000 AUG 28 PM 2:38
DISSEMINATION BRANCH

In regard to the proposed changes in the Thrift Financial Report (TFR) to be effective with the March 2001 reporting cycle, I offer the following comments:

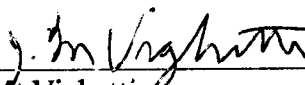
Item 13 Average Balance Sheet Data - Reporting daily or weekly balance averages on total assets, average interest earning assets and average interest costing liabilities is too taxing on the institution. Maintaining, calculating and reporting this data is not warranted just to avoid skewed data when restructuring and acquisitions occur. How often do restructuring and acquisitions ever occur?

Item 14 Board of Directors IRR Limits - This information is currently confidential between the institution and its regulators and there is no valid reason to make it public. You can do off-site monitoring with the institution's Interest Rate Risk Policy obtained by the examiners during on-site examinations.

31. Eliminating Confidential Treatment for certain interest rate risk and past due data. This information is confidential between the institution and its regulators and no portion should be made public. I object making this information public just to give the public more information on the level of and trends in interest rate risk.

You need to consider the hardship all this financial reporting places on smaller institutions rated 1 or 2 with limited staff.

Very truly yours,


J. M. Vighetti
Treasurer

JMV/db